

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor

PROMESA

Title III

No. 17 BK 3283-LTS

Jointly Administered

**REPLY TO OMNIBUS REPLY OF THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO IN SUPPORT OF
DEBTORS' JOINT MOTION FOR AN ORDER (I) SCHEDULING
HEARING TO CONSIDER THE ADEQUACY OF INFORMATION
CONTAINED IN THE DISCLOSURE STATEMENT, (II) ESTABLISHING THE
DEADLINE FOR FILING OBJECTIONS TO THE DISCLOSURE STATEMENT
AND REPLIES THERETO, (III) APPROVING FORM OF NOTICE THEREOF,
(IV) ESTABLISHING DOCUMENT DEPOSITORY PROCEDURES
IN CONNECTION THEREWITH, AND (V) GRANTING RELATED RELIEF**

TO THE HONORABLE COURT:

COME NOW, Salud Integral de la Montaña, Inc. (SIM), through its undersigned attorney and respectfully states as follows:

1. The Financial Oversight and Management Board filed an omnibus reply to several creditors objections to its motion the schedule for the disclosure statement hearing. The Board “generously” extended the period by 7 days.

2. Footnote 4 of the aforesaid motion states that “[a]ssuming the amended Plan and Disclosure Statement are filed no later than April 28, 2021, parties will have at least twenty-three (23) days to review the amended Plan and Disclosure Statement before the proposed Objection Deadline of May 21, 2021.” This is of an amended plan whose last iteration is over 2,000 pages including the disclosure statement.

3. The “generous” 23 days that the Board wants to grant creditors is not even the minimum time of 28 established by Bankruptcy Rule 3017. We must understand that this is the biggest “municipal” bankruptcy in history and to shorten the minimum period established by the Bankruptcy Rules is ludicrous.

3. Moreover, although it is likely that the new plan will have much of the older plans, creditors do not know what parts, if any, are deleted and what parts are added. This means having to read it again and evaluate it. SIM renews its petition for a 45-day period from the actual date the Board files the new disclosure statement and new plan.

WHEREFORE: SIM requests from the Honorable Court that it take notice of this motion and establish deadlines beginning 45-days after the Board files the new disclosure statement and new plan.

Respectfully submitted on this 22nd day of April, 2021.

CERTIFY: That on this same day, the ECF system sent a copy of this motion to all parties in this litigation.

/s John E. Mudd
John E. Mudd
Bar Number: 201102
Attorney for Plaintiffs
LAW OFFICES JOHN E. MUDD
P. O. BOX 194134
SAN JUAN, P.R. 00919
(787) 413-1673
Fax. (787) 753-2202
johnmuddlaw@gmail.com